

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CNA INSURANCE COMPANY LIMITED,

Plaintiff,

v.

EXPEDITORS INTERNATIONAL OF  
WASHINGTON, INC. d/b/a EXPEDITORS  
INTERNATIONAL OCEAN, and DOE I,

Defendants.

No. 2:18-cv-00932-RSM

**PARTIES' JOINT MOTION TO  
CONTINUE DEADLINES FOR  
SUBMISSION OF PRE-TRIAL FILINGS**

**Note for Motion: October 13, 2020**

COME NOW the parties, and hereby stipulate and jointly move the Court, pursuant to LCR 16(b)(6), to extend the deadlines for the parties' submission of a proposed pre-trial order, trial briefs, and any other pre-trial filings not yet exchanged or submitted until 30 days before the Court reschedules the trial date.

This admiralty matter addresses plaintiff subrogated insurer's claims against defendant non-vessel operating common carrier for cargo allegedly damaged during ocean transit. Trial was scheduled to commence on November 2, 2020. Dkt. 57. By its General Order 15-20 dated October 2, 2020, the Court continued all civil trials scheduled to commence before January 1, 2021 pending the Court's issuance of another general order. The parties are unable to agree to a trial by remote video conferencing.

The Court may extend the case scheduling dates for good cause. LCR 16(b)(6). The parties submit that good cause exists to extend the deadlines for pre-trial submissions so as to avoid their expenditure of financial and other resources during the pandemic, when such resources are challenged, and when communication with party and non-party witnesses is

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difficult. Because trial will not commence for at least several months, the parties and the Court will not experience any detriment to a continuance of pre-trial filings that is commensurate with the new trial date. Accordingly, the parties respectfully request a continuance of the deadlines for remaining pre-trial filings.

DATED this 13th day of October, 2020.

s/ Steven W. Block

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s/ James F. Whitehead

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*Attorneys for Plaintiff CNA Insurance Company,  
Ltd.*

## ORDER

The parties having so stipulated, and the Court finding good cause for entry hereof,  
NOW, THEREFORE, IT IS HEREBY ORDERED that the deadlines for the parties' submission of a proposed pre-trial order, trial briefs, and any other pre-trial filings not yet exchanged or submitted are hereby

CONTINUED until 30 days before the Court reschedules the trial date.

1 Dated this 14<sup>th</sup> day of October, 2020.

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5 RICARDO S. MARTINEZ  
6 CHIEF UNITED STATES DISTRICT JUDGE

7 *Presented by:*

8 */s/ Steven W. Block*

9 Steven W. Block, WSBA No. 24299

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17 *s/ James F. Whitehead*

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25 *s/ James A. Saville, Jr.*

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PARTIES' JOINT MOTION TO CONTINUE DEADLINES FOR  
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**CERTIFICATE OF SERVICE**

I certify that on October 13, 2020, I electronically filed the foregoing document with the Clerk of the Court via CM/ECF which will notify all parties in this matter who are registered with the Court's CM/ECF filing system of such filing.

Executed in Seattle, Washington this 13th day of October, 2020.

s/ Michelle Stark

Michelle Stark, Legal Assistant/Paralegal